

# **EXHIBIT 1**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

STINGRAY IP SOLUTIONS, LLC,

*Plaintiff,*

v.

SIGNIFY N.V.,

*Defendant.*

Civil Action No. 2:21-cv-00043-JRG  
Civil Action No. 2:21-cv-00044-JRG

**DECLARATION OF ERIK VERMEULEN**

I, Erik Vermeulen, hereby declare under penalty of perjury that:

1. My name is Erik Vermeulen. I am a citizen of the Netherlands and am at least eighteen (18) years of age. I am competent to testify to the matters stated herein. I have personal knowledge of the facts and statements in this declaration, and each of the facts and statements is true and correct.

2. I understand that the above-captioned cases are patent infringement actions, with Stingray IP accusing Signify N.V. of infringing its patents.

3. I have been an employee at Signify Netherlands B.V. since 2016. I am currently Senior Legal Counsel, with responsibility for corporate matters and corporate housekeeping.

4. I am also a Professor of Business and Financial Law and the Director of the International Business Law program at Tilburg University in the Netherlands. I teach business organizations and governance, law and technology, and business innovation and finance at Tilburg Law School, TIAS School for Business and Society, and at other universities around the world.

5. By virtue of my position, my education, and my background, I am familiar with the corporate structure of Signify N.V. and its subsidiaries, and the legal requirements and corporate formalities required for each corporation to be legally separate and distinct.

6. Signify N.V. is a publicly traded corporation organized under the laws of the Netherlands and has its principal place of business in the Netherlands.

7. Signify N.V. is a holding company that does not itself manufacture, design, sell, or offer to sell any products.

8. Signify N.V. has no U.S. employees or any place of business in the United States. Signify N.V. does not do any business in any U.S. state nor is it registered to do business in any U.S. state.

9. Signify North America Corporation, which is not a Defendant in the above-captioned case, is an operating company organized under the laws of Delaware and has a principal place of business in New Jersey. Signify North America Corporation is an indirectly wholly-owned subsidiary of Signify N.V. Specifically, Signify North America Corporation is wholly owned by the Genlyte Group Inc., which is wholly owned by Signify Holding B.V., which is wholly owned by Signify N.V.

10. WiZ Connected Lighting Co. Limited (“WiZ”), which is not a Defendant in the above-captioned case, is an operating company organized under the laws of Hong Kong and has a principal place of business in Hong Kong. WiZ is an indirectly wholly-owned subsidiary of Signify N.V. Specifically, WiZ is wholly owned by Signify China Holding B.V., which is itself wholly owned by Signify Holding B.V., which is itself wholly owned by Signify N.V.

11. Neither Signify North America Corporation nor WiZ maintain any place of business in the Eastern District of Texas.

12. There is no overlap in the management, directors, or employees of Signify N.V., Signify North America Corporation, and WiZ. The members of Signify N.V.’s board of management are:

- Eric Rondolat
- Javier van Engelen, and
- Maria Letizia Mariani

13. The directors and officers of Signify North America Corporation are:

- Rogier Dierckx
- Michael Manning
- Robert Farley
- Brian Jacobs, and
- Kevin Poyck

14. The members of WiZ Connected Lighting Co. Limited's board of management are:

- Rowena Lee and
- Deepak Mohta.

15. Signify N.V. does not have any control over the daily operations of Signify North America Corporation or WiZ. Rather, each subsidiary has complete control over their respective daily operations. For example, Signify N.V. has no authority to hire or fire employees of Signify North America Corporation or WiZ, or to force those indirect subsidiaries to enter into particular employment, sales, or purchase contracts. These corporate entities each have independent employee policies.

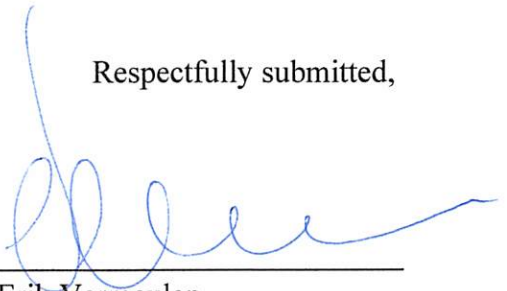
16. Signify North America Corporation, and WiZ each track and account for their revenues, expenses, and profits individually and have their own annual financial statements. Each files their own income tax returns, each has their own banking accounts, and each is independently capitalized.

17. Signify N.V., Signify North America Corporation, and WiZ each maintain all required corporate formalities under their respective local and national laws. Each entity maintains its own corporate records and follows the requirements of their respective articles of incorporation and/or corporate by-laws. The separate directors and management of each individual entity conduct regular meetings, execute business, and otherwise strictly observe the corporate formalities defining each corporate entity as a separate and legally distinct entity.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: May 27, 2021

Respectfully submitted,

A handwritten signature in blue ink, consisting of a series of loops and a long horizontal stroke, positioned above a solid horizontal line.

Erik Vermeulen